

## **REMARKS**

Reconsideration of the application, as amended, is respectfully requested.

The application is directed at liquid laundry detergent compositions comprising of polyanionic ammonium surfactant.

Claims 1-13 were rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/63334.

Applicants respectfully traverse the rejection. WO '334 was cited at page 1, line 21 of the specification as an example of numerous disclosures in the art of mixtures of polyamines and anionic surfactants. Applicants do not dispute that such mixtures are known.

The present invention is based at least in part on the discovery that polyanionic ammonium surfactants (hereinafter "PAAS") employed in the present invention exhibit different characteristics and perform substantially better than physical mixtures of anionic surfactants and polyamines. See page 1, lines 27-30 of the specification. PAAS is made from a precursor of an anionic surfactant, i.e. a conjugate acid of an anionic surfactant, which in and of itself is not a surfactant. See the description of the process at page 8 of the specification. Applicants employ this acid precursor and a polyamine to produce the PAAS which is a different entity from the physical mix of polyamines and anionic surfactants. In that respect, please note Example 1 and Comparative Example 1A at page 27 of the specification and examples 6 and 6A, at page 34 demonstrating the differences in physical properties between PAAS vs. mixtures of polyamine and anionic surfactant as in WO '334. Also, please note Example 7 and Comparative Example 7A starting at page 36 of the specification which are directed to the differences in performance between PAAS formulation (Example 7) compared to anionic surfactant/polyamine mixture (Example 7A). See also differences in performance for the deposition of the fluorescent agent

in Example 15 and Comparative Example 15A starting at page 38 of the specification.

Thus, applicants' specification contains ample evidence of the criticality of using PAAS which is a different entity than a mere mixture of anionic surfactant and polyamine disclosed in WO '334.

In light of the above amendments and remarks, it is respectfully requested that the rejection over WO '334 be reconsidered and withdrawn and the application be allowed to issue.

If a telephone conversation would be of assistance in advancing the prosecution of the present application, applicants' undersigned attorney invites the Examiner to telephone at the number provided.

Respectfully submitted,



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